

**REMARKS**

Claims 1-14 and 17-33 remain standing in this application. Claim 14 has been amended. Claims 15 and 16 have been cancelled without prejudice to the underlying subject matter contained therein. Reconsideration and allowance of the standing claims are respectfully requested.

The Applicant would like to thank the Examiner for removing the previous objection to the Specification.

The drawings stand objected to because of missing prior art labels in FIG. 1A and FIG. 1B. FIG. 1A and FIG. 1B have been modified to include the missing prior art labels. Removal of this objection is respectfully requested.

**35 U.S.C. § 112, Second Paragraph**

Claims 6, 24 and 32 stand rejected under 35 U.S.C. 112, second paragraph, as being indefinite. Applicant respectfully requests reconsideration and removal of this rejection.

Claim 6 is definite under 35 U.S.C. 112, second paragraph. According to the Office Action, claim 6 is indefinite because “when a first physical address maps to second physical address, the first physical address is converted from one address format to another address format by way of a conversion means and/or a protocol.” The Office Action continues by stating that “[a]fter the mapping/conversion is performed, the first physical address would become the second physical address that the second physical address could not possibly be embedded with the first physical address.” Office Action,

Pages 2-3. The Applicant respectfully disagrees. The “first physical address” and “second physical address” as used in claim 6 refer to separate addresses. For example, the “first physical address” may comprise a global physical address and the “second physical address” may comprise a local physical address. Specification, Pages 19-20. Even if they were the same address as the Office Action suggests, it would not be necessary to eliminate one address while mapping to another address. Consequently, it is possible to embed the “second physical address” within the “first physical address.” An example of this may be shown in FIG. 5 and accompanying description (e.g., Specification, Page 20). Accordingly, removal of this rejection is respectfully requested.

Claims 24 and 32 are also definite under 35 U.S.C. 112, second paragraph. As with claim 6, the terms “global physical address” and “local physical address” as used in claims 24 and 32 refer to separate addresses. Consequently, claims 24 and 32 are definite for at least the same reasons given for claim 6. Accordingly, removal of this rejection is respectfully requested.

### **35 U.S.C. § 103(a)**

Claims 1-20 and 27 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Data and Computer Communications, Fifth Edition, William Stallings, 1997 (“Stallings”) in view of USPN 6,711,167 (Ikeda). Applicant respectfully traverses this rejection.

As correctly noted by the Office Action, “Stalling does not specifically disclose a virtual interface VI work queue.” The Office Action further states that “Ikeda discloses an ATM apparatus in which a cell buffer is used for temporarily holding data of a

received IP packet, and is used by a sending/receiving controller for generating an ATM cell after referring to a VC table (see lines 47-48, 53-57, col. 12).” “Ikeda further discloses a VC table is holding data indicating the relation between an IP address and VCI/VPI of ATM cells (descriptors about VI work queue, see lines 49-52, col. 12).” Office Action, Page 5. Applicant respectfully disagrees.

Claims 1-5 define over Stallings and Ikeda. The relevant citation at Ikeda discloses a technique to convert IP packets to ATM cells. Claims 1-5 each recite the feature of “at least one virtual interface (VI) work queue.” An example of a “VI work queue” may be a VI work queue as described in the Virtual Interface (VI) Architecture Specification, Version 1.0, December 16, 1997 (“VI Architecture Specification”). Specification, Page 6: Lines 5-8. Ikeda does not mention the use of a VI work queue in any context. Further, the use of VCI/VPI identifiers is a standard ATM technique to connect a pair of ATM nodes, and has no relation to a VI work queue as recited in the claimed subject matter. Removal of this rejection for claims 1-5 is therefore respectfully requested.

Claims 6-13 also define over Stallings and Ikeda. Claims 6-13 each recite the language “mapping a first physical address of a remote node to a second physical address of the remote node...wherein the second physical address is embedded within the first physical address.” As previously discussed, the LAN emulation service described by Stallings includes a technique to map a MAC address to an ATM address. Stallings fails to disclose, however, having a MAC address embedded within an ATM address, or vice-versa. Ikeda also fails to disclose this feature. Removal of this rejection for claims 6-13 is therefore respectfully requested.

Claims 14-20 define over Stallings and Ikeda. Claims 14-20, as amended, each recite the language “using a single ARP protocol over a network to determine a first physical address to a network address correspondence for a node of the network and to determine a first physical address to a network address correspondence for a node of the network and to determine a first physical address to a second physical address correspondence for the node in the network, wherein the second physical address is embedded within the first physical address.” As previously discussed, the LAN emulation service described by Stallings includes a technique to map a MAC address to an ATM address. Stallings fails to disclose, however, having a MAC address embedded within an ATM address, or vice-versa. Ikeda also fails to disclose this feature. Removal of this rejection for claims 14-20 is therefore respectfully requested.

Claim 27 defines over Stallings and Ikeda. Claim 27 uses a “VI channel.” A “VI channel” refers to a virtual interface channel as defined, for example, in the VI Architecture Specification. As previously discussed, Stallings and Ikeda both fail to discuss a “VI channel” as recited in the claimed subject matter. Removal of this rejection for claim 27 is therefore respectfully requested.

**35 U.S.C. § 103(a)**

Claims 21-26 and 28-33 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Stallings in view of USPN 6,697,360 (Gai). Applicant respectfully traverses this rejection.

Claims 21-26 define over Stallings and Gai. As discussed with reference to claim 27, claims 21-26 and 28-33 also use a “VI channel.” According to the Office Action,

Stallings discloses that “each ATM cell contains virtual channel identifiers (establishing a connection-oriented VI channel between first node and each of the one or more nodes.)”

Office Action, Page 7. As stated previously, a virtual channel identifier is not a “VI channel” or used to create a “VI channel” as recited in the claimed subject matter.

Rather, a virtual channel identifier is a standard identifier used to set up an ATM connection. A virtual channel identifier as used in ATM does not relate to a “VI channel.” Removal of this rejection for claims 21-26 and 28-33 is therefore respectfully requested.

For at least the above reasons, Applicant submits that claims 1-14 and 17-33 recite novel features not shown by the cited references. Further, Applicant submits that the above-recited novel features provide new and unexpected results not recognized by the cited references. Accordingly, Applicant submits that the claims are not anticipated nor rendered obvious in view of the cited references.

It is believed that claims 1-14 and 17-33 are in allowable form. Accordingly, a timely Notice of Allowance to this effect is earnestly solicited.

The Examiner is invited to contact the undersigned at 724-933-3387 to discuss any matter concerning this application.

Application No. 09/599,000  
Amendment Dated 9/7/2004  
Reply to Office Action of April 7, 2004

The Office is hereby authorized to charge any additional fees or credit any overpayments under 37 C.F.R. § 1.16 or § 1.17 to Deposit Account No. 02-2666.

Respectfully submitted,

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John F. Kacvinsky, Reg. No. 40,040  
Under 37 CFR 1.34(a)

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to:  
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Deborah Higham

9-7-04

Date

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**Appendix** including amended drawing figures.